

LDW  
RECEIVED 0582-137  
11/15/2010

NOV 16 2010

Environmental  
Cleanup OfficeEE/CA  
1423 Third Avenue, Suite 300  
Seattle, Washington 98101  
Phone 206.287.9130  
Fax 206.287.9131  
www.anchorqea.com**TRANSMITTAL**

---

**To:** Kris Flint  
EPA, Region 10  
1200 Sixth Avenue, Suite 900  
M/S ECL-115  
Seattle, Washington 98101**From:** Ryan Barth,  
Anchor QEA, LLC**Date:** November 15, 2010**Re:** Second Draft EE/CA,  
Jorgensen Forge Facility**Project:** 080224-01.01

---

**Number      Description**

- |   |  |
|---|--|
| 1 | CD containing Second Draft EE/CA and Response to EPA Comments Letter |
| 1 | Hard copy of Response to EPA Comments Letter                         |

**Cc:**

Gilbert Leon, EMJ  
Ron Altier, Wayne Desberg, and Steve Abelman; Jorgensen Forge  
William Joyce; Salter Joyce Ziker, PLLC  
Rod Brown and Josh Lipsky, Cascadia Law Group  
Christy Brown, EPA  
Shawn Blocker, EPA  
John Keeling, Ecology  
Richard Thomas, Ecology  
Peter Jewett and Amy Essig Desai; Farallon Consulting, LLC  
Jim Bulman, WSP

---

USEPA SF



1488277



1423 Third Avenue, Suite 300  
Seattle, Washington 98101  
Phone 206.287.9130  
Fax 206.287.9131

---

November 15, 2010

Christy Brown  
Project Coordinator, Office of Air, Waste and Toxics  
U.S. Environmental Protection Agency, Region 10  
1200 6th Avenue, AWT-121  
Seattle, WA 981012

Re: Second Draft Engineering Evaluation/Cost Analysis  
Jorgensen Forge Facility  
8531 East Marginal Way South, Seattle, Washington  
EPA Docket No. CERCLA-10-2003-0111, 2008

Project Number: 080224-01

Dear Ms. Brown:

Enclosed please find four hard copies and one electronic copy (on CD) of the Second Draft Engineering Evaluation/Cost Analysis (Second Draft EE/CA) for the Jorgensen Forge Corporation (Jorgensen Forge) Facility located at 8531 East Marginal Way South in Seattle, Washington (the Facility). The Second Draft EE/CA was prepared on behalf of the Earle M. Jorgensen Company (EMJ) and Jorgensen Forge and meets the requirements of the First Amendment to the Administrative Order on Consent (AOC) issued by the U.S. Environmental Protection Agency (EPA) on April 15, 2008 (EPA Docket No. CERCLA-10-2003-0111, 2008).

EMJ and Jorgensen Forge previously submitted a Draft EE/CA to EPA in March 2009; EPA provided comments to EMJ and Jorgensen Forge in April 2010. The Second Draft EE/CA has been revised to incorporate the comments provided by EPA and the U.S. Army Corps of Engineers (USACE), the results of technical meetings held with EPA in May and July 2010, and subsequent communications with the EPA and USACE.

In accordance with the August 2007 Memorandum of Understanding (MOU) between EMJ, Jorgensen Forge and The Boeing Company (Boeing), these parties have met regularly over the last three years to discuss cleanup alternatives and project integration for the sediment and associated shoreline bank remedies to be completed for the Facility and immediately adjacent Boeing Plant 2 Facility (Plant 2). To the extent possible—given the ongoing and incomplete negotiations between Boeing and EPA—the results of these coordination efforts are included in both the Second Draft EE/CA and Boeing's Duwamish Sediment Other Area and Southwest Bank Interim Measure Alternatives Evaluation (IMAE) for Plant 2.

During initial development of the Second Draft EE/CA and IMAE, EPA required that both documents detail the integration of the adjacent cleanup alternatives, be submitted for public review and comment concurrently, and maintain the same schedule. In September 2010, however, EPA communicated concern that delays in the IMAE development would slow down finalization of the Second Draft EE/CA. For this reason—contrary to previous written feedback and the MOU—EPA required that the adjacent cleanup actions be decoupled to allow submittal of the Second Draft EE/CA ahead of the IMAE.

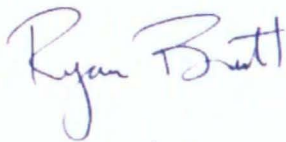
Because of this change in approach, EMJ and Jorgensen Forge would like to request a meeting with the Plant 2 and Facility EPA project managers in early December 2010 to discuss the issues raised by EPA's decision to decouple the projects. If EPA decides to re-couple the projects, this meeting should discuss the key elements of the remedy selection process, a joint public review process for the IMAE and Second Draft EE/CA alternative selection, the details of an integrated schedule, and specific steps to potentially meet a late 2012 in-water construction window. EMJ and Jorgensen Forge believe that this meeting should occur early on in EPA's review of the Second Draft EE/CA and IMAE—which is understood to be provided to EPA on December 1, 2010—and before preparation of the

---

EE/CA Action Memorandum and the Boeing Basis of Fact. Having the meeting at this time would allow key technical and logistical issues to be discussed.

If you have any questions regarding the Second Draft EE/CA please contact either of the undersigned at (206) 287-9130. Amy Essig Desai from Farallon Consulting, LLC, will also contact you to schedule a mutually convenient time to meet in early December and discuss EPA's decision to decouple the EMJ/Jorgensen Forge and Boeing cleanup projects.

Sincerely,



Ryan Barth, P.E.  
Anchor QEA, LLC



David Templeton, Partner  
Anchor QEA, LLC

**Cc:**

Gilbert Leon, EMJ  
Ron Altier, Wayne Desberg, and Steve Abelman; Jorgensen Forge  
William Joyce; Salter Joyce Ziker, PLLC  
Rod Brown and Josh Lipsky, Cascadia Law Group  
Shawn Blocker, EPA  
Kris Flint, EPA  
John Keeling, Ecology  
Richard Thomas, Ecology  
Peter Jewett and Amy Essig Desai; Farallon Consulting, LLC  
Jim Bulman, WSP

---